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Federal Public Defender  
2 Nevada State Bar No. 11479  
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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 JASON ANTHONY LIEBOLD,  
14 Defendant.

Case No. 2:15-mj-340-VCF

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(Fifth Request)

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16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,  
17 United States Attorney, and Jiamie Chen, Assistant United States Attorney, counsel for the  
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Rebecca A.  
19 Levy, Assistant Federal Public Defender, counsel for Jason Anthony Liebold, that the  
20 Preliminary Hearing currently scheduled on October 20, 2015, be vacated and continued to a  
21 date and time convenient to the Court, but no earlier than fourteen (14) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. The parties are currently involved in negotiations to resolve this matter pre-  
24 indictment.  
25 2. The defendant is detained and does not oppose a continuance.  
26 3. The parties are in agreement to the continuance.

1           4.       Additionally, denial of this request for continuance could result in a miscarriage  
2 of justice. The additional time requested by this Stipulation is excludable in computing the time  
3 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United  
4 States Code, Section 3161 (h)(1)(D) and Title 18, United States Code, Section 3161(h)(7)(A),  
5 considering the factors under Title 18, United States Code §§ 3161(h)(7)(B) and  
6 3161(h)(7)(B)(iv).

7           This is the fifth request for continuance filed herein.

8           DATED this 19<sup>th</sup> day of October, 2015

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10       RENE L. VALLADARES  
11       Federal Public Defender

DANIEL G. BOGDEN  
United States Attorney

12       /s/ *Rebecca A. Levy*  
13       By \_\_\_\_\_  
14       REBECCA A. LEVY  
15       Assistant Federal Public Defender

/s/ *Jiamie Chen*  
By \_\_\_\_\_  
JIAMIE CHEN  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

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6 JASON ANTHONY LIEBOLD,

7 Defendant.

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**ORDER**

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on  
12 October 20, 2015 at the hour of 4:00 p.m., be vacated and continued to November 4, 2015  
13 hour of 4:00 p.m. at the

14 DATED this 20th day of October, 2015

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17 UNITED STATES MAGISTRATE JUDGE